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George Hofmann (10005)
Adam Reiser (13339)
Parsons Kinghorn Harris
A Professional Corporation
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
Telephone: (801) 363-4300
Facsimile: (801) 363-4378

Attorneys for debtor-in-possession,
Mineral Resources International, Inc.

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FEB 02 2015
DIV. OF OIL, GAS & MINING

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

In re

MINERAL RESOURCES
INTERNATIONAL, INC.,

Debtor.

Bankruptcy No. 13-30606 (RKM)

Chapter 11

NOTICE OF DEBTOR'S MOTION TO EXTEND DEADLINE UNDER BANKRUPTCY
CODE § 1129(e) THROUGH AND INCLUDING APRIL 29, 2015, AND
NOTICE OF HEARING

(Objection Deadline: February 17, 2015)
(Hearing Date: February 24, 2015 at 11:00 a.m.)

PLEASE TAKE NOTICE that Mineral Resources International, Inc. (the "Debtor"), through its undersigned counsel, has filed the Debtor's Motion to Extend Deadline Under Bankruptcy Code § 1129(e) Through and Including April 29, 2015 (the "Motion").

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief requested in the Motion, then you or your lawyer must **both**:

(1) on or before February 17, 2015 file with the Bankruptcy Court a written objection to the Motion, explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before February 17, 2015. You also must mail a copy to the undersigned counsel at:

Adam Reiser
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84101

and

(2) attend the hearing on the Motion which is set for February 24, 2015 at 11:00 a.m. in Courtroom 369, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah 84101. **Failure to attend the hearing will be deemed a waiver of your objection.**

If you or your attorney do not take both of the above-described steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion, and may enter an order granting that relief.

In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing and enter an order approving the Motion without hearing.

Dated: January 29, 2015

PARSONS KINGHORN HARRIS
A Professional Corporation

/s/ Adam Reiser
GEORGE HOFMANN
ADAM REISER

Attorneys for the Debtor

George Hofmann (10005)
Adam Reiser (13339)
Parsons Kinghorn Harris
A Professional Corporation
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
Telephone: (801) 363-4300
Facsimile: (801) 363-4378

Attorneys for debtor-in-possession
Mineral Resources International, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

In re

MINERAL RESOURCES
INTERNATIONAL, INC.,

Debtor.

Bankruptcy No. 13-30606 (RKM)

Chapter 11

**DEBTOR'S MOTION TO EXTEND DEADLINE UNDER BANKRUPTCY CODE
§ 1129(e) THROUGH AND INCLUDING APRIL 29, 2015**

Mineral Resources International, Inc., debtor and debtor-in-possession in the above-captioned case (the "Debtor"), hereby moves this Court (the "Motion") for entry of an Order extending the deadline under Bankruptcy Code § 1129(e) through and including April 29, 2015, which represents an extension of approximately 60 days from the present deadline of February 27, 2015. In support of this Motion, the Debtor respectfully states as follows:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Debtor filed a voluntary chapter 11 petition on September 16, 2013. The Debtor continues to operate its business and manage its property as a debtor in possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. No examiner or trustee has been appointed in this case.

4. On July 11, 2014, the Debtor filed its Plan of Reorganization (the "Plan").

5. The Debtor indicated on its Chapter 11 petition that it is a "small business debtor" as defined in Bankruptcy Code § 101(51D).¹

6. Under Bankruptcy Code § 1129(e), in a small business case, a plan which complies with the Bankruptcy Code shall be confirmed "not later than 45 days after the plan is filed unless the time for confirmation is extended in accordance with section 1121(e)(3)" (the "45 day deadline").

7. In turn, Bankruptcy Code § 1121(e)(3) permits the Court to extend the 45 day deadline if the Debtor demonstrates that it is more likely than not that the Court will confirm a plan within a reasonable period of time, a new deadline is imposed at the time the extension is granted, and the order extending time is signed before the existing deadline has expired.

¹ The Debtor reserves the right to amend its petition as appropriate concerning its status or non-status as a "small business debtor." Without limiting the generality of the foregoing, should the Debtor's unsecured creditors form an official committee, the Debtor would by definition no longer be a "small business debtor."

8. The present deadline expires on February 27, 2015. The Debtor respectfully requests entry of an Order extending the deadline through and including April 29, 2015, which is an extension of approximately 60 days.

9. The Debtor submits that good grounds exist to extend the deadline based on the following:

A. The Debtor diligently filed its Plan in advance of the 300 day deadline;

B. The Court has approved three prior extensions to the deadline. After each extension the Debtor continued to negotiate the Plan in good faith with interested creditors.

C. The Debtor has made significant changes to the Plan to satisfy all outstanding objections the Plan. Through recent negotiations and modifications to the Plan, the Debtor is confident that all outstanding objections to the Plan have been, or will very soon be, resolved and that the current Plan will be approved by all creditors.

D. The Court has conditionally approved the Disclosure Statement associated with the current Plan.

E. The Debtor submits that the Plan, on its face, is confirmable and satisfies the requirements of Bankruptcy Code § 1129;

F. In the event the Plan is not confirmed as filed, the Debtor will act promptly to file an amended plan and seek its confirmation.

WHEREFORE, the Debtor respectfully requests the Court to enter an Order extending the current February 27, 2015 deadline through and including April 29, 2015, and granting such other and further relief as is just.

Dated: January 29, 2015

PARSONS KINGHORN HARRIS
A Professional Corporation

/s/ Adam Reiser
GEORGE HOFMANN
ADAM REISER
Attorneys for the Debtor